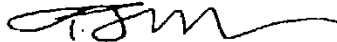


2. Attached hereto as Exhibit 1 is a true and correct copy of pp. 14-17, 52-54, 57-58, 63, 66, 75-78, 89-90, 111-112, 114-115, and Exhibit C of the Transcript of the Deposition of Christina M. Camacho.

3. Attached hereto as Exhibit 2 is a true and correct copy of pp. 107-109 of the Transcript of the Deposition of May Paulino, and pp. 134-139, authenticating Exhibits 7, 8, 9 and 10.

Under penalty of perjury I declare that the foregoing is true and correct.

Executed this 5th day of November, 2007 in Tamuning, Guam.



TIM ROBERTS

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UNITED STATES DISTRICT COURT
DISTRICT OF GUAM

U.S. EQUAL EMPLOYMENT)	CASE NO. 1:06-CV-00028
OPPORTUNITY COMMISSION,)	
)	
Plaintiff,)	
)	
vs.)	
)	
LEO PALACE RESORT,)	
)	
Defendant.)	
<hr/>		
JENNIFER HOLBROOK, VIVIENE)	
VILLANUEVA, and ROSEMARIE)	
TAIMANGLO,)	
)	
Plaintiff-Intervenors,)	
)	
vs.)	
)	
LEO PALACE RESORT,)	
)	
Defendant.)	

DEPOSITION TRANSCRIPT

OF

CHRISTINA M. CAMACHO

March 15, 2007

PREPARED BY:

GEORGE B. CASTRO
DEPO RESOURCES

#49 Anacoco Lane
Nimitz Hill Estates
Piti, Guam 96915

Tel: (671) 688-DEPO * Fax: (671) 472-3094

COPY

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DOOLEY ROBERTS & FOWLER LLP

EXHIBIT 1

1 Q And how many times did you speak with
2 Mr. Roberts?

3 A I met with him once.

4 Q Okay. And where did you meet with him
5 at?

6 A At his office.

7 Q Okay. And that's his office here in
8 Guam?

9 A Yes.

10 Q And how long did the meeting take
11 place?

12 A I'd say about less than an hour.

13 Q Less than an hour. And, did he call
14 you or you called him?

15 A He contacted me.

16 Q Okay. And did he tell why he wanted to
17 talk to you?

18 A Yes.

19 Q And what did he tell you?

20 A About the case against Leo Palace,
21 Equal Opportunity Employment.

22 Q Okay. And so you came down to his
23 office and he introduced himself. Did he
24 introduce himself as an attorney for Leo
25 Palace?

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1 A Yes.

2 Q And did he ask you questions?

3 A Yes.

4 Q Okay. And why don't you give us some
5 substance of the conversation between yourself
6 and Mr. Roberts?

7 A I don't really recall.

8 Q Did he ask you specific questions about
9 what happened in 2004?

10 A Yes, he was asking me questions about
11 that.

12 Q Okay. And as you sit here today you
13 don't recall any of the questions that he asked
14 you?

15 A He was asking about like the
16 conversations between Jen, Viv, and Rose and I.

17 Q Okay. And do you recall when he asked
18 you about those conversations between Rose,
19 Vivienne and Jennifer?

20 A Yes.

21 Q And what did you tell him?

22 A That we were always joking.

23 Q Okay. And did he ask about specific
24 conversations between you and the three women?

25 A I don't remember.

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1 Q Well, let me ask you this. Did he ask
2 you whether or not the three of you spoke about
3 sexual relations?

4 A Yes, he asked me.

5 Q Okay. And was your response?

6 A Yes.

7 Q Okay. And did he ask you about
8 specific incidents?

9 A Yes.

10 Q Okay. For instance did he ask you
11 about an incident involving rolling up of a
12 paper towel in the shape of a penis?

13 A Yes.

14 Q Okay. And what was your response to
15 that question?

16 A Yeah, I remember that.

17 Q okay. And did that incident happen?

18 A Yes.

19 Q Okay. And did you do that?

20 A I didn't really know how to do it.
21 They're the ones showing me to.

22 Q I'm sorry, who was showing you?

23 A The other girls I was with.

24 Q Okay. So, but you had the paper towel;
25 is that correct?

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1 A It wasn't -- I can't remember if it was
2 a paper towel or a wash cloth.

3 Q Okay. Paper towel or wash cloth. But
4 at the end of the day, it was rolled into the
5 shape of the penis?

6 A Yes.

7 Q Okay. And what did you do with this
8 paper towel or towel that you had, shaped of
9 the penis?

10 A We were just messing around with it.

11 Q You were messing around with it. And
12 other than -- were all three of these women
13 present when that happened?

14 A I don't remember.

15 Q Okay. Do you have any memory as to any
16 of those women being present when that
17 happened?

18 A I know Rose, because she was always
19 there.

20 Q Okay. And wasn't Greg Perez also
21 present?

22 A I don't remember.

23 Q Okay. Was Mr. Suzuki present?

24 A I don't remember.

25 Q Okay. And did he ask you about an

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1 Q Sure. Did you ask May or any of the
2 managers and so forth why you were being
3 terminated for these allegations of sexual
4 harassment?

5 A I don't think so.

6 Q Did anyone actually say to you -- in
7 the conference you had with May, did she
8 actually use the term sexual harassment?

9 A I think so.

10 Q Okay. So, you knew that someone had
11 said that you had harassment; is that correct?

12 A Yes, I believe so.

13 Q And, you also said you knew it was
14 because of me, you, but did you deny any of the
15 allegations that were made against you?

16 A No, because we were always joking.

17 Q Did May ask you to submit anything in
18 writing regarding your side of what happened?

19 A I'm not so sure. I don't remember.

20 Q Did any of the managers ask you to
21 submit anything in writing in your defense as
22 to any of these allegations?

23 A I don't think so.

24 Q Did anyone ask you -- because you said
25 that you guys were always joking?

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1 A Yeah. Because they would joke back,
2 you know, back and forth.

3 Q I understand. Yeah, the give and take
4 among --

5 A Yeah.

6 Q -- co-workers.

7 A So, I didn't really think of anything
8 that --

9 Q You didn't think anything was wrong
10 with it, right?

11 A Yeah.

12 Q And no one told you anything was wrong
13 with it, is that right?

14 A Because if they told me, I would have
15 stopped.

16 Q Okay. And did Rose ever tell you that
17 she was offended by any of the conduct toward
18 her?

19 A No.

20 Q Did she ever counsel you and tell you
21 to stop these, you know, making these comments
22 and so forth?

23 A She was just like, tell me I think
24 sometime, "I think that's enough, Christina" or
25 something.

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1 Q Okay.

2 A "Let's get to work" or something like
3 that.

4 Q And you just kind of kept on doing it
5 because everyone kind of was joking back with
6 you?

7 A Yes.

8 Q And did Greg Perez ever talk to you
9 about this?

10 A I don't remember him talking to me.

11 Q Okay. And, again, just so we're clear.
12 The first time that you had heard of any --
13 the first time you heard of any of the
14 allegations that in fact you were going to be
15 fired, was when you have the conversation with
16 May and she actually let you go?

17 A Yes.

18 Q And were you surprised?

19 A Yes, I was surprised because we were
20 just always joking around.

21 Q Did May tell you, you could appeal the
22 termination?

23 A No, she didn't say anything.

24 Q Did she tell you that the decision was
25 final?

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1 know, the three of you worked together, and the
2 few times you worked with Jennifer, did you use
3 sexually explicit language?

4 A We were always joking, so I would think
5 so, yes.

6 Q Okay. And did you talk about sex?

7 A Yes.

8 Q And did you guys tell jokes and stuff
9 like that?

10 A Yes.

11 Q And did you ever make sexual comments
12 to customers?

13 A Yes, one time we were joking around.

14 Q Okay. And was that the time when you
15 talked about a candle --

16 A Yes.

17 Q -- was actually a vibrator?

18 A Yes.

19 Q And you said that to a customer?

20 A No, because we were talking amongst
21 ourselves so -- but the customer was right
22 there.

23 Q The customer was right there. And now
24 that you've had some training in sexual
25 harassment, do you believe that was proper?

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1 A No, that wasn't.

2 Q Okay. And did you ever talk about
3 using a dildo?

4 A I believe so.

5 Q Okay. And you did that on the
6 workplace?

7 A Yes, I did.

8 Q And now that you've had training in
9 sexual harassment at your new job, is that
10 appropriate talk in a workplace?

11 A No.

12 Q Okay. And it's not appropriate for any
13 of you to talk about that, isn't that correct?

14 A Yes, that's true.

15 Q Okay. And did you talk about
16 performing oral sex on your girlfriend?

17 A I don't remember.

18 Q Okay. Is it that you just don't
19 remember or you could have?

20 A I could have, but I don't recall.

21 Q Okay. And did you ever make any kind
22 of comment that you like to perform oral sex on
23 your girlfriend when she was menstruating
24 because you like the taste of blood?

25 A Yeah.

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1 individuals talked to you during the entire
2 time that you were there that anything you were
3 doing was inappropriate?

4 A No.

5 Q And no one ever accused you of sexual
6 harassment until you talked to May on the day
7 that you were fired?

8 A I think so.

9 Q And did you ask May if any of the other
10 women were being investigated for participating
11 in this conduct?

12 A I think I asked her how come they
13 didn't let me know, because I would've stopped.

14 Q Okay. But, how come they didn't let
15 you know because you would've stopped. Okay?

16 A Yeah, I would have known that it was
17 going too far.

18 Q Right. And you know now; you don't it
19 at all, right?

20 A Yes.

21 Q But at the time that you were at Leo
22 Palace, no one seemed to really care? Was that
23 your attitude?

24 A Well, I mean they didn't let me know
25 what was going on.

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1 that you were fired, you had said that, you
2 know, if these women would've told me I
3 would've stopped. But did you ask May anything
4 -- did you say anything to the effect that, you
5 know, are these women being disciplined for
6 anything? Or are they being fired too?

7 A I never questioned it.

8 Q You never questioned it. Do you think
9 that they should have been fired too?

10 A No, I don't think so.

11 Q Okay. Because they didn't do anything,
12 right?

13 A Well, I mean, we all joked around, but
14 — (pauses).

15 Q After you were fired, have you spoken
16 with Vivienne or Rose or Jennifer, since you've
17 been fired?

18 A Think I met Jen. She came into my work
19 one day to gas.

20 Q Okay. But it was just pleasantries?

21 A Yeah, I didn't really say much.

22 Q Oh.

23 A Just, hi and that's about it.

24 Q And other than the conversation you had
25 with Mr. Roberts here, you haven't had any

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1 Q If the person -- hear my question --

2 A (coughs) Sorry. Go ahead.

3 Q Take your time.

4 A I'm running out of water.

5 MR. TORRES: You want that?

6 A What is that?

7 MR. TORRES: These are just breath
8 mints, and at least it'll coat your throat.

9 BY MR. ROBERTS:

10 Q If a person, in your understanding now
11 that you've had sexual harassment training, if
12 a co-worker makes a sexual joke to you, and you
13 think it's funny and it doesn't bother you, is
14 that sexual harassment?

15 A No.

16 Q And if you make a sexual joke back to
17 that person, that person laughs and thinks it
18 funny, are you sexually harassing that person?

19 A No.

20 Q Okay. This paper towel wash cloth
21 penis incident, you said you know Rose was
22 there. Is that what you said?

23 A I'm not too sure.

24 Q Do you remember, was one of the
25 claimants there? And when I say, claimants, I

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1 mean Rose, Jen- --

2 A Rose was probably there because she was
3 always.

4 Q Yeah. And do you remember what Rose's
5 reaction to it was?

6 A I think if I'm not mistaken --
7 (pauses). I don't recall.

8 Q Do you remember whether Rose ever made
9 any jokes or maybe asked you any question or
10 made any comments to you of a sexual nature?

11 A (no audible response)

12 Q You have to speak out loud.

13 A Yes.

14 Q Like what?

15 A You can say, we're like, because, you
16 know, we always have breakfast. So, she'll say
17 like she'll bring the sausage, you know,
18 because she likes sausage. You know, like --
19 and I'll bring the eggs because I like eggs.

20 Q Okay. I --

21 A In a joking way.

22 Q I know what you're talking about, but I
23 need you to explain what you mean by sausage
24 and eggs. What was Rose referring to you when
25 she said I'll bring the sausage?

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1 A A private part.

2 Q A male penis?

3 A Yes.

4 Q And when you said I'll bring the eggs,
5 what were you referring to?

6 A The girls.

7 Q Vaginal areas?

8 A Yes.

9 Q Okay.

10 A I mean, you know, that's how -- or
11 pancakes. You know, it was just --

12 Q And that one, I don't get. What's
13 pancakes?

14 A I don't know, I guess just pancake. I
15 don't, you know -- (pause)

16 Q No, I don't. What gender's body does
17 pancakes -- did the word pancakes referred to?

18 A I don't know.

19 Q But was it of a --

20 A Yeah, just -- you know, the pancakes,
21 like punket (phonetic), pancakes.

22 Q Oh, like punket (phonetic).

23 A You know, I guess just the -- slang, I
24 guess.

25 Q Punket (phonetic) is a Chamorro slang

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1 for a female vagina. And in the three months
2 that you worked there, did Rose ever tell you
3 that any of your jokes or comments or questions
4 of a sexual nature were unwanted or unwelcome
5 or offensive to her?

6 A Not really.

7 Q When you say "not really", can you
8 explain you answer?

9 A She wouldn't say it like that. She
10 will just say, you know, tell me, "That's
11 enough, gotta get back to work" or, you know,
12 things like that. She wouldn't tell me if was
13 making anybody feel uncomfortable.

14 Q You said that your relationship with
15 Rose and the other two, Jenny and Vivienne was
16 professional in nature, you know, co-worker,
17 right? Would you consider Rose to have been
18 your friend?

19 A I would consider her friend.

20 Q Jennifer, do you remember any jokes or
21 comments or questions of a sexual in nature
22 that may have come from Jennifer toward you?

23 A I don't even remember.

24 Q Do you remember making any jokes or
25 comments or ask any questions of a sexual in

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1 Q Have you read that to yourself now?

2 A (unintelligible)

3 Q You have to speak up?

4 A Yes.

5 Q Do you see any mistakes in here or
6 things that you disagree with?

7 A No.

8 Q Is this an accurate account of your
9 interview with May?

10 A I can say it probably is, I don't
11 remember. It's been a long time, but it sounds
12 correct.

13 Q And I think you already testified to
14 this. If Rose had ever said, "Stop acting
15 inappropriately" or "Stop acting inappropriate
16 manner regarding sexual matters", what would
17 you've done?

18 A I would have stopped.

19 Q And if Rose had ever said, "Stop making
20 comments of a sexual nature in the work place",
21 what would you've done?

22 A I would have stopped.

23 Q And how about Vivienne, if she had ever
24 said, "Stop conducting yourself in an
25 inappropriate way with respect to sexual

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1 matters in a work place", what would you've
2 done?

3 A I would have stopped.

4 Q And what if Vivienne had said, "Stop
5 making a jokes of a sexual nature in the work
6 place", what would you've done?

7 A I would have stopped?

8 Q And the same two question for Jennifer,
9 if she had said, "Stop acting in an
10 inappropriate way with respect to sexual
11 matters in a work place", what would you've
12 done?

13 A I would have stopped.

14 Q And if Jennifer had said, "Stop making
15 remarks of a sexual nature in a work place",
16 what would you've done?

17 A I would have stopped.

18 Q And did any of those people ever say
19 any those things?

20 A Besides, I think Vivienne.

21 Q Yeah, and what Vivienne say?

22 A I think I was making her feel
23 uncomfortable.

24 Q Uncomfortable? And so what did you do?

25 A I stopped.

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1 Q I think you were asked by Leo Palace's
2 Counsel whether a humping incident had
3 occurred, where you basically rubbed up against
4 somebody, one of your co-workers, I think was
5 Vivienne. Do you remember that?

6 A No.

7 Q Could that have happened though?

8 A I don't think the humpy incident.

9 Q Okay. When you were doing these
10 things, telling these jokes and doing these
11 actions, were you intending to harm anybody?

12 A No.

13 Q Okay. Would these things happen though
14 in like a daily basis?

15 A (pauses)

16 Q I mean, you're going to tell jokes --

17 A Yeah.

18 Q -- everyday at work and so we're
19 talking about sexual jokes. And in your sexual
20 harassment training, and you keep saying, well,
21 we will joke around. Were you taught that
22 there comes a point when it's no longer a joke?

23 A Yes.

24 Q You would swear at work?

25 A Yes.

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1 Q The incident that Mr. Roberts asked you
2 about, the candle, actually that was the
3 wedding candle of a guest who was checking-out,
4 right?

5 A Yes.

6 Q And you made a comment that it looks
7 like a vibrator in his presence, in the guest's
8 presence?

9 A Yes.

10 Q And that was actually referred to also
11 by May Paulino, that you can't do those kinds
12 of things?

13 A Yes.

14 Q Okay. How come you just didn't realize
15 you can't do those kinds of things?

16 A Well, I guess because everybody was
17 joking, I thought it was okay.

18 Q Okay. But, this is a guest. This is
19 different than what you were talking about
20 before joking.

21 A Uh-huh.

22 Q So, Mr. Roberts kept asking you didn't
23 you understand, you don't need sexual
24 harassment training, it's common sense. But it
25 wasn't common sense for you, was it?

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1 A Just housekeeping.

2 Q I mean, was she a supervisor? Has she
3 been working a long time?

4 A She was working there for a long time.

5 Q Okay. Did she help you to get this
6 job? Did she refer you?

7 A No.

8 Q You said that when Rose talked to you
9 her comments were something to the effect that
10 that's enough. Could she also have said that
11 that's inappropriate? That you can't behave
12 like this behind here, behind the desk?

13 A She probably could have.

14 Q Yeah. And she did tell you, you have
15 to stop this kind of behavior, right?

16 MR. ROBERTS: What was the question?

17 BY MR. TORRES:

18 Q Did she tell you that you have to stop
19 this kind of behavior?

20 A I don't recall, but probably could
21 have?

22 Q Okay. Is it fair to say that basically
23 this behavior, that you referred to as joking,
24 happened in the time that, you know, shortly
25 after you started working until really about

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1 the time that you're terminated?

2 A I could say. There were days, I guess,
3 we weren't busy.

4 Q Did you make these jokes in front of
5 Mr. Suzuki?

6 A I don't remember.

7 Q Okay. Could you have? Could he have
8 been aware of your behavior?

9 MR. ROBERTS: Objection, anything's
10 possible.

11 MR. MCCLINTON: You can still get the
12 answer.

13 BY MR. TORRES:

14 Q You can answer the question.

15 A Probably. I don't recall.

16 Q Okay. Did Mr. Suzuki ever talk to you
17 about your behavior while he was at work?

18 A I don't remember him ever talked with
19 me about it.

20 Q Did you consciously curtail this joking
21 behavior when Mr. Suzuki was around?

22 A I can't remember.

23 Q Okay. Do you think you might have or
24 you're just going to be you the whole time?

25 A I don't remember.

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On August 11, 8:15 AM

May Paulino HR Manager and Cristina Camacho (Front Desk Clerk)

May: Cristina, approximately a month and a half ago, you were verbally warned about physical harassment against another employee.

Cristina: Yes, I think that was awhile back. It was Viviane. Since then I don't joke or do anything to her.

May: Did you slapped Jennifer's Butt?

Cristina: Yes, All she said was like "Hello". then she said that she felt very Uncomfortable. May, we all joke around upstairs. Like Rose, she Asked what is for breakfast. Is it sausage. And I said yeah, I like pancakes. May they ask me about my personal life. I am a Lesbian. And when they ask me. I just tell them out straight. Rose will ask me Who I slept with, or how do I eat pussy from the side. I won't do any Harm to them....but they never told me to stop. We all joke. All of us. We all laugh.

May: Did you ever joke to guest?

Cristina: No.

May: At one time, a guest just married came to front desk and was holding a candle. You told the guest that, the candle is a vibrator?

Cristina: I don't remember. I think so. And the guest just laughed.

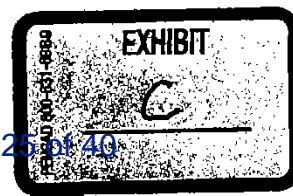
May: Cristina, You don't talk dirty jokes to guest. They might not know what you are saying that moment, but sooner or later they will. And am sure they won't appreciate. Then when they get to Japan, they will complaint at home office.

Cristina: It won't happen again. I need this job. Please....

May: I will talk to management and will get back to you as to what the decision would be.

Cristina: Okay.

(3)



1 sexual experiences with other female -- with
2 other females while they're in the workplace?

3 A Yes.

4 Q Okay.

5 A Uh-huh.

6 Q And did you ask Ms. Camacho when you --
7 did you interview Ms. Camacho?

8 A Yes, I did.

9 Q Did you ask her about that?

10 A Yes, I did.

11 Q And what she say?

12 A She said that Rose Taimanglo, she said
13 that they -- Rose Taimanglo and Jennifer and
14 Christina will ask her about her sexual
15 relations with a woman. Do you want me to go
16 in detail?

17 Q Sure. That's why we're here.

18 A Okay. Christina Camacho had told me
19 that Rose Taimanglo asked her that Rose said
20 "How do you eat a pussy from the side" and "Why
21 do you like women instead of men" and "Why do
22 you sleep, who did you sleep with the night
23 before?". At one time they were talking about
24 breakfast and Rose said "I like pancake", and
25 Christina said, "oh, I like sausage".

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1 Q Okay. And --

2 A That's all.

3 Q That's -- what are the -- I understand.
4 Okay. And after Ms. Camacho told you what
5 these three women that they would ask her about
6 this, did you go back and ask them whether or
7 not they had made these comments to Ms.
8 Camacho?

9 A Yes, I did.

10 Q And what'd they say?

11 A They said they all laughed about it.
12 They entertained her. They all joked.

13 Q Okay. That's not what I asked you. I
14 asked you whether or not they admitted, for
15 instance you said that Ms. Camacho said that
16 one of them had asked her about how to eat a
17 woman's pussy --

18 A Uh-huh.

19 Q -- okay? Did you go back and ask her?
20 And I forget who it was that you said, said
21 that. But did you go back and ask her whether
22 or not she had actually said that to Ms.
23 Camacho?

24 A I -- it was Ms. Taimanglo.

25 Q Okay. And did you ask her that?

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1 A Yes, I did.

2 Q And what did Ms. Taimanglo say?

3 A She just smiled and she said -- she
4 just smiled.

5 Q She didn't answer?

6 A She didn't answer.

7 Q Did you ask her why she was smiling?

8 A When I asked her, she smiled and she
9 just said that they -- they all joked around.
10 Christina jokes at them.

11 Q Okay. Ms. Paulino, regarding this
12 particular comment that you, you referred to,
13 okay?

14 A Uh-huh.

15 Q Did Ms. Taimanglo deny that she'd ever
16 said that to Ms. Camacho?

17 A I don't remember, sir, she denied.

18 Q During -- the other incidences that you
19 referred to, the other comments that you said
20 Ms. Camacho had stated that these women had
21 said, did these women denied making those
22 comments to Ms. Camacho?

23 A No, sir.

24 Q Was there any other witnesses who you
25 interviewed, who heard these women make these

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1 Q Okay. And this went to the same
2 incident regarding the Camacho being in the
3 condo and threatening these three young ladies.
4 Is that correct?

5 A Yes, sir.

6 Q Okay. We'll mark this as Number 6 and
7 that's -- 0297. The next document I'm going to
8 ask you to look at is a two-page -- I want to
9 do it collectively because it looks like it's
10 two different documents. So let me just run
11 through them. It's a -- I don't have --

12 MR. McCLINTON: Do you have the Bate
13 Stamps on yours?

14 MR. ROBERTS: Yes.

15 MR. McCLINTON: Okay. First one I'm
16 looking at is, at the top it says August 10?

17 MR. TEKER: Yeah. 00189.

18 MR. ROBERTS: It's LPR 00189.

19 MR. McCLINTON: And the second page of
20 that is 190?

21 MR. TEKER: Yes.

22 MR. McCLINTON: Okay.

23 BY MR. McCLINTON:

24 Q I'm going to show you a two-page
25 document. It's on Leo Palace Resort

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1 letterhead. The first page is August 10, 2004.
2 May Paulino, and it says "Anne Rose Taimanglo,
3 Front Desk Clerk" and there's a second page.
4 Can you tell me, is this a -- just look at the
5 front and back and tell me if that's the
6 complete document regarding that interview?

7 A Yes, sir.

8 Q And what is that document?

9 A It's my investigation report, sir.

10 Q Okay. Investigation report, regarding
11 who?

12 A Christina.

13 Q Christina?

14 A Camacho, sir.

15 Q Okay. Is that your interview of who?

16 A Rose.

17 Q Rose Taimanglo?

18 A Taimanglo, yes.

19 Q Okay. We'll mark this as 7. And that
20 was -- is that a complete document there?

21 (Exhibit 7 was marked for
22 identification)

23 A Yes, sir.

24 Q Okay. There's nothing missing, is that
25 correct?

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1 A No, sir.

2 Q Okay. The second document I'm going to
3 show you is -- okay. This is a one-page
4 document, it's dated August 11th, I'm sorry,
5 yeah, August 11th, no year, 8:15 a.m., May
6 Paulino, HR Manager and Christina Camacho,
7 Front Desk Clerk and it appears to be just a
8 one page document. And ask you to take a look
9 at that.

10 (Exhibit 8 was marked for
11 identification)

12 A Yes, sir.

13 Q Is that your interview of Ms. Camacho?

14 A Yes, sir.

15 Q And it consisted of just this one page
16 document?

17 A Yes, sir.

18 Q Okay. Well, we'll make that -- that's
19 8.

20 MR. McCLINTON: Is there a Bate Stamp
21 Number on that one?

22 MR. TEKER: 00191.

23 BY MR. McCLINTON:

24 Q And the next one I'm going to show you
25 is on Leo Palace Resort letterhead, I believe

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1 it's a -- it looks like a one page document,
2 August 11, 2004, 2:45 p.m., May Paulino, HR
3 Manager and Jennifer Holbrook Front Desk Clerk.
4 Take a look at that, and when you're finished,
5 let me know.

6 (Exhibit 9 was marked for
7 identification)

8 A Yes.

9 Q Have you seen that before?

10 A Yes.

11 Q Are those your notes?

12 A Yes.

13 Q And is that the complete notes of your
14 interview with Ms. Holbrook?

15 MR. ROBERTS: Her own notes?

16 MR. McCLINTON: Yes, her notes.

17 A Yes, sir. My own notes.

18 BY MR. McCLINTON:

19 Q Okay. And there are no notes other
20 than these notes, is that correct? Regarding
21 Ms. Holbrook?

22 A All mine. That's it.

23 Q Okay.

24 MR. McCLINTON: And that one is
25 probably what, 92?

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1 MR. TEKER: 192.

2 MR. McCLINTON: And that'll be 9.

3 BY MR. McCLINTON:

4 Q And I'll show you a document August 11,
5 2004 at 1:45 p.m., again document May Paulino,
6 HR Manager and Vivienne Villanueva, I want to
7 ask you -- take a look at that and tell me if
8 you have seen that before.

9 A Yes.

10 Q Okay. And did you prepare this
11 document?

12 A Yes, sir.

13 Q Okay. Does this consist of your
14 complete and total interview of Ms. Villanueva?

15 A Yes, sir.

16 Q Okay.

17 MR. McCLINTON: And that's 193, right?

18 MR. TEKER: That -- which one?

19 MR. McCLINTON: That -- this one.

20 MR. TEKER: That's -- no. That's 194.

21 MR. McCLINTON: Oh, 194.

22 MR. TEKER: The handwritten notes are
23 193.

24 MR. McCLINTON: Okay.

25 MR. ROBERTS: Off the record for just

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1 one second?

2 MR. McCLINTON: Sure, sure.

3 (off the record from 11:59 a.m. to
4 11:59 a.m.)

5 MR. McCLINTON: Okay. So that will be
6 10, and never identified it, right?

7 (Exhibit 10 was marked for
8 identification)

9 BY MR. McCLINTON:

10 Q That was 0194. And the Exhibits 10, 9,
11 8, 7, and 6, that was the documents I showed
12 you regarding the interviews, those were all
13 prepared by you, is that correct?

14 MR. ROBERTS: I think Palacios was 6,
15 I'm not sure of that, though. I think it's 7,
16 8, 9, 10, and 11.

17 MR. McCLINTON: Oh, I'm sorry, you're
18 right, you're right. So, it's 7, 8, 9, and 10.

19 BY MR. McCLINTON:

20 Q Those were all prepared by you, is that
21 correct?

22 A Yes, sir.

23 Q Okay. And those were -- that's a
24 complete record of your interview with these
25 three women or the three women regarding the

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On August 10, 2004 around 2:20 PM Mr. Cus

May Paulino HR Manager and Rose Johnson (Front Desk Clerk)

Rose: May, It's about Cristina...this is going on too much. She slapped my butt. I don't appreciate it. I have warned her several times. I have warned her verbally, that if she continues on that I will report her to HR office. May, I am concern. You know Jen (Jennifer Holbrook) she had made a comment that she can easily sue this company for sexual harassment with Cristina.

May: Does Mr. Suzuki know what's going on? Did you report this to Mr. Suzuki?

Rose: You know May, Suzuki San is very busy. Always busy.

May: But he should be told. He has to know all these. You are the supervisor you have to tell him.

Rose: Yes.

May: Is Mr. Suzuki working today? I will have to talk with him and get back to you tomorrow.

August 11, 2004 around 7:30 am. I called Rose via cell phone and asked her if Christina is working today. She said yes. I told her (Rose) to tell Cristina to clock out and go home that I will talk to her later.

Rose called me and said that Cristina wanted to talk to me, and that Cristina will not leave the premises, but will wait for me. (May)

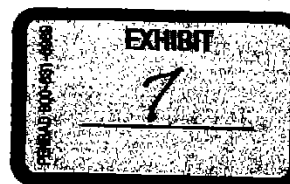
August 11, 2004 11:25AM

May: Rose, Cristina told me that you folks at front desk jokes with her. That you had asked her, her personal life. Like who does she sleeps with. Like how does she make love to the other woman? And how does she eat pussy?

Rose: May, she tells us that herself.

May: When she makes sexual jokes/comments you ladies at front desk entertain her?

Rose: Yeah, we laughed.



May: So you entertain her. You as a supervisor should have told her to stop her acts...that it is not acceptable and to stop it. Then she would know. As long as no one is telling her, she will continue on.

Rose: May I told her several times. I warned her several times. So she knows.

May: Did you document those verbal warnings?

Rose: No.

May: Whenever you talk to your staff you warned them verbally, always write it down in black and white. Get a notebook, make a bible for yourself. Whatever it is write it down. If you say You reported it to me or Mr. Suzuki, then if anything should happen, you would not be blamed for. It is out of your hands. Just anything document it down for your own protection. How do you feel if Cristina was to continue working at front desk.

Rose: May, I feel sorry for her. This is the only job she has. Her other job she is no longer working there. She tells us she still is..but really, she is not. I will forgive her for what she has done to me. I feel for her.

May: I will talk to Mr. Hana and Mr. Suzuki about this. Then a decision will be made. I will keep you posted.

On August 11, 2:15 AM

May Paulino HR Manager and Cristina Camacho (Front Desk Clerk)

May: Cristina, approximately a month and a half ago, you were verbally warned about physical harassment against another employee.

Cristina: Yes, I think that was awhile back. It was Viviane. Since then I don't joke or do anything to her.

May: Did you slapped Jennifer's Butt?

Cristina: Yes, All she said was like "Hello". then she said that she felt very Uncomfortable. May, we all joke around upstairs. Like Rose, she Asked what is for breakfast. Is it sausage. And I said yeah, I like pancakes. May they ask me about my personal life. I am a Lesbian. And when they ask me. I just tell them out straight. Rose will ask me Who I slept with, or how do I eat pussy from the side. I won't do any Harm to them...but they never told me to stop. We all joke. All of us. We all laugh.

May: Did you ever joke to guest?

Cristina: No.

May: At one time, a guest just married came to front desk and was holding a candle. You told the guest that, the candle is a vibrator?

Cristina: I don't remember. I think so. And the guest just laughed.

May: Cristina, You don't talk dirty jokes to guest. They might not know what you are saying that moment, but sooner or later they will. And am sure they won't appreciate. Then when they get to Japan, they will complaint at home office.

Cristina: It won't happen again. I need this job. Please....

May: I will talk to management and will get back to you as to what the decision would be.

Cristina: Okay.





On August 11, 2004 2:45 PM COUNTRY CLUB
May Paulino HR Manager and Jennifer Holtz (Front Desk Clerk)

May: Okay, Tell me what's going on with Cristina.

Jennifer: Am sure that she was brief regarding sexual harassment when she first worked. Yes, she knows her work. Like all the girls. She knows how to make the keys, etc....

May: Yes, All employees are brief regarding sexual harassment on the first day of employment. Sexual harassment is a very sensitive matter, and it has to be corrected immediately.

Jennifer: She is work in her customer service, too much on the telephone she uses profanity in front of all of us. One day she spanked my butt and I was so uncomfortable. I told her no one touches body. She has no right to spanked my behind. She at one time pulled out her breast to one of the bell staff, she flashes her kotox to Mr. Ijima she is very disrespectful.

May: Did Mr. Ijima say anything when she flashed her kotox in front of him? she was told not to do that. You folks (Front Desk Staff) jokes with her. You folks entertained her sexual jokes?.

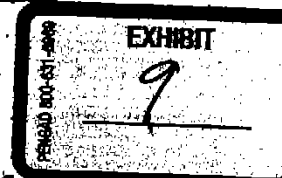
Jennifer: Yes, at times we laughed about it.

May: That's the mistake. If she makes sexual comments/ jokes and you folks don't appreciate. You should tell her to stop immediately. tell her to stop. And then she knows that you really don't like her comments/jokes. As long as you don't tell her she will continue on to make those comments.

Jennifer: Yes!

May: How do you feel if she was to continue working at front desk. No decision has been made yet. I just want to hear your from you.

Jennifer: I am very uncomfortable... when I heard what she did the past day I feel so disgusted with her. She is very disrespectful! She spends too much time on the phone.



On August 11, 2004 1:45PM

May Paulino HR Manager and Vivian Villanueva Front Desk Clerk

May Paulino: Vivian, you're here because of the previous incidents that was reported to me regarding Cristina Camacho for sexual harassment.

Sometimes back 1 ½ months ago, Greg Perez (FD Night Manager) talked to me (May) that you (Vivian) had mentioned to him that Cristina placed her hand on you buttocks and you were taken by surprise. I told Greg Perez to talk to Cristina regarding this incident.

Vivian: Since then Cristina does not joke or talk to me in any form of harassment. She is a good person sometimes very aggressive. I feel comfortable to work with her now. If I don't want her to bother me, I just stay away from her, and she stays away from me. she's okay now.

May: So you're comfortable working with her now. No problem. With her?

Vivian: No.

May: Alright, Once I complete this interview with other staff's involved I will get back to you regarding her status.

Vivian: Okay.

